UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

)
In re:) Chapter 7
)
ALEXANDER E. JONES,) Case No. 22-33553 (CML)
)
Debtor.)
)

THE TEXAS PLAINTIFFS' WITNESS AND EXHIBIT LIST FOR HEARING ON JANUARY 23, 2025

Neil Heslin, Scarlett Lewis, Leonard Pozner, Veronique De La Rosa, and the Estate of Marcel Fontaine file this witness and exhibit list for the hearing in connection with the *Motion to Approve Settlement with PQPR and Related Parties* [Dkt. 1005], *Motion to Approve Settlement with the Connecticut Families and the Texas Families* [Dkt. 1011], and *Motion to Approve Settlement with ESG* [Dkt. 1018] scheduled for January 23, 2025 at 9:00 AM (prevailing Central Time) (the "Hearing") as follows:

WITNESSES

The Texas Plaintiffs may call any of the following witnesses at the Hearing:

- 1. Any witness called or listed by any other party; and
- 2. Any witness necessary to rebut the testimony of any witness called or designated by any other party.

EXHIBITS

The Texas Plaintiffs may offer into evidence any one or more of the following exhibits at the Hearing:

1. Any pleading or other document filed with the Court on the docket of the above-captioned case or in *In re Free Speech Systems LLC*, Case No. 22-60043 (CML);

2. Any exhibit listed by any other party; and

3. Any exhibit necessary to rebut the evidence or testimony of any witness offered or

designated by any other party.

The Texas Plaintiffs reserve the right to amend and/or supplement this Witness and Exhibit

List as necessary in advance of the Hearing. Further, the Texas Plaintiffs reserve the right to use

any exhibits presented by any other party and to ask the Court to take judicial notice of any

document. The Texas Plaintiffs further reserve the right to introduce exhibits previously admitted.

[Remainder of page intentionally left blank]

2

Dated: January 21, 2025

Respectfully submitted,

/s/ Jennifer J. Hardy

WILLKIE FARR & GALLAGHER LLP

Jennifer J. Hardy State Bar No. 24096068 600 Travis Street Houston, TX 77002

Telephone: (713) 510-1766

Fax: (713) 510-1799

E-mail: jhardy2@willkie.com

WILLKIE FARR & GALLAGHER LLP

Stuart R. Lombardi (admitted *pro hac vice*) Ciara A. Sisco (admitted *pro hac vice*) 787 Seventh Avenue New York, NY 10019

Telephone: (212) 728-8000

Fax: (212) 728-8111

E-mail: slombardi@willkie.com E-mail: csisco@willkie.com

LAWSON & MOSHENBERG PLLC

Avi Moshenberg State Bar No. 24083532 801 Travis Street, Suite 2101, #838 Houston, TX 77002

Telephone: (713) 449-9644

E-mail: avi.moshenberg@lmbusinesslaw.com

CHAMBERLAIN, HRDLICKA, WHITE, WILLIAMS & AUGHTRY, PC

Jarrod B. Martin State Bar No. 24070221 1200 Smith Street, Suite 1400 Houston, TX 77002

Telephone: (713) 356-1280

Fax: (713) 658-2553

E-mail: jarrod.martin@chamberlainlaw.com

Co-Counsel to the Texas Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Witness and Exhibit List has been served on counsel for all parties receiving or entitled to notice through CM/ECF on January 21, 2025.

/s/ Jennifer J. Hardy Jennifer J. Hardy